

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**LAYTHRON TILLIS, an Individual  
and ETHEL TILLIS, an Individual**

**PLAINTIFFS,**

**VS.**

**CECIL E. CAMERON, an Individual;  
HERTZ CLAIMS MANAGEMENT, a  
foreign corporation; THE HERTZ  
CORPORATION, a foreign  
corporation,**

**DEFENDANTS.**

**CASE NO.: 07-CV-78-WKW**

**MOTION TO CONTINUE DEADLINE FOR FILING  
RESPONSE TO MOTION FOR SUMMARY JUDGMENT  
FILED BY HERTZ CLAIMS MANAGEMENT**

Come now the Plaintiffs and move this Court to extend the deadline for filing an opposition to the Motion For Summary Judgment filed by Hertz Claims Management until after the Plaintiffs have deposed the Defendant Cecil Cameron on June 13, 2008, and in support of this Motion, argue as follows:

1. The Defendant Hertz Claims Management is the company that has been adjusting the Plaintiffs' insurance claim against Cecil Cameron since the inception of this lawsuit in 2004;
2. Because of the various Motions and briefs which have been filed by the parties, the parties only recently began discovery;
3. The Defendants deposed the Plaintiffs on March 27, 2008, and the Plaintiffs have scheduled the deposition of the Defendant for June 13, 2008, in Panama City, Florida;
4. The Plaintiffs need this additional discovery in order to assess the strength of their

claims against the Defendant, Hertz Claims Management. In particular, the Plaintiffs seek to explore the attempts that Hertz Claims Management took to locate the Defendant while this case was pending in state court, said attempts forming the basis of their claims against that Defendant;

5. The deadline for discovery has not passed in this case, and none of the parties will be prejudiced by this extension.

WHEREFORE, for the above reasons, the Plaintiffs move this Court to continue the deadline for the filing of an Opposition to the Motion for Summary Judgment filed by the Defendant Hertz Claims Management until June 20, 2008.

/s/Thomas B. Albritton

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing upon all counsel of record in this cause by electronic service if registered, and if not then by placing a copy of same in the United States mail, postage prepaid, addressed as follows on this, the 30th day of May, 2008:

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